

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA : INFORMATION
:
- v. -
:
HUA FEN BI, :
:
Defendant. :
:
----- X

20 CRIM (CM) 401

COUNT ONE
**(Conspiracy to Operate an
Unlicensed Money Transmitting Business)**

The United States Attorney charges:

1. From at least in or about August 2017 up to and including at least in or about 2019, in the Southern District of New York and elsewhere, HUA FEN BI, the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, operation of an unlicensed money transmitting business, in violation of Title 18, United States Code, Section 1960.

2. It was a part and object of the conspiracy that HUA FEN BI, the defendant, and others known and unknown, did knowingly conduct, control, manage, supervise, direct, and own all or a part of an unlicensed money transmitting business, in violation of Title 18, United States Code, Section 1960.

OVERT ACTS

3. In furtherance of the conspiracy, and to effect the illegal objects thereof, HUA FEN BI, the defendant, together with others known and unknown, committed the following overt acts, in the Southern District of New York and elsewhere:

a. On or about October 19, 2017, BI sent a photograph of the names of two companies ("Company-1" and "Company-2") to a co-conspirator not named herein ("CC-1"). On or about October 20, 2017, seven checks totaling \$79,600 were issued from businesses owned by a co-conspirator not named herein ("CC-2"), and deposited into bank accounts for Company-1 and Company-2. CC-2 received cash from BI in exchange for those seven checks, and stored at least some of that cash in a residence and storage facilities located in Manhattan, New York.

b. On or about March 29, 2018, BI assisted a co-conspirator not named herein ("CC-3") in exchanging \$49,290 in U.S. currency for four checks totaling \$49,290, issued from businesses owned by CC-2, at the request of CC-2. The checks were made out to a company ("Company-3"), and deposited into a bank account for Company-3 on or about March 30, 2018. CC-2 received cash from BI in exchange for those four checks, and stored at least some of the cash in a residence and storage facilities located in Manhattan, New York.

(Title 18, United States Code, Section 371.)

FORFEITURE ALLEGATION

4. As a result of committing the offense alleged in Count One of this Information, HUA FEN BI, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any and all property, real and personal, involved in said offense, or any property traceable to such property, including but not limited to a sum of money in United States currency representing the amount of property involved in said offense.

Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property

of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)



AUDREY STRAUSS
Acting United States Attorney

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(18 U.S.C. § 371.)

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Acting United States Attorney
